

From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Tuesday, May 31, 2022 3:48:42 PM

To: Paul Weeks <PWeeks@KSLAW.com>; Laura Harris <lharris@kslaw.com>; Luke Roniger <LRoniger@KSLAW.com>

Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>

Subject: Re: Rule 26(f) Report

CAUTION: MAIL FROM OUTSIDE THE FIRM

I am available any time, send a calendar

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From: Paul Weeks <PWeeks@KSLAW.com>

Sent: Tuesday, May 31, 2022 3:47:25 PM

To: Igor Litvak <Igor@LitvakLawNY.com>; Laura Harris <lharris@kslaw.com>; Luke Roniger <LRoniger@KSLAW.com>

Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>

Subject: RE: Rule 26(f) Report

Thank you, Igor. We are generally fine with your first and last proposed changes. We have some questions about your proposed changes to Sections C and E and think at this stage a quick phone call to discuss is the best path forward. Are you available now (or at some point in the next hour)? We can send along a calendar.

Separately, for planning purposes we'd like to discuss whether your clients intend to come to New York for in-person depositions, and if not, where they propose to make themselves available for in-person depositions.

Thanks,
Paul

Paul Weeks

Senior Associate

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From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Tuesday, May 31, 2022 3:30 PM

To: Laura Harris <lharris@kslaw.com>; Luke Roniger <LRoniger@KSLAW.com>

Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>; Paul Weeks <PWeeks@KSLAW.com>

Subject: Re: Rule 26(f) Report